

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11
FTX TRADING, LTD., *et al.*,¹ Case No. 22-11068 (KBO)
(Jointly Administered)
Debtors. Related Documents: 28643, 30077-30081

NOTICE OF CROSS-MOTION TO COMPEL ARBITRATION

PLEASE TAKE NOTICE that on December 9, 2024, the above-captioned debtors (the “**Debtors**”) filed the *Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1)* [D.I. 28643](the “**Amended Claims Objection**”) and in response thereto, on April 7 2025, Seth Melamed filed the: (i) *Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration* (the “**Cross Motion**”); [D.I. 30077]; (ii) *Declaration of Ryo Kawabata in Support of Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration* [D.I. 30078]; (iii) *Declaration of Takane Hori in support of Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration* [D.I. 30079] (the ; (iv) *Declaration of Takane Hori in support of Payment of Post-Petition Director's Fees* [D.I. 30080] and (v) *Declaration of Seth Melamed in support of Opposition to Debtors Amended*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases (collectively, the “**Debtors**”), a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>

Objection to Proofs of Claim and Motion for Subordination pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30081].

PLEASE TAKE FURTHER NOTICE that Melamed hereby provides notice to the Debtors, the FTX Recovery Trust and all other parties in interest of the deadline to object to the Cross-Motion: Objections to the relief requested in the Cross-Motion shall (a) be in writing (b) state with particularity the basis of the objection; and (c) be filed on or before **4:00 p.m. (prevailing Eastern Time) on May 7, 2025** (the “**Objection Deadline**”) with the Clerk of the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington Delaware 19801, and served on the undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing on the Amended Claims Objection and the Cross-Motion will be held on **May 14, 2025 at 9:30 a.m. (prevailing Eastern Time)**, or as otherwise agreed by the Committee and the Debtors. Only those objections made in writing and timely filed in accordance with the above procedures will be considered by the Bankruptcy Court at such hearing.

Dated: April 23, 2025
Wilmington, DE

McCARTER & ENGLISH, LLP

/s/ Shannon D. Humiston
Shannon D. Humiston (No. 5740)

Renaissance Centre
405 North King Street, 8th Floor
Wilmington, DE 19801
Telephone: (302) 984-6300
Facsimile (302) 984-6399
shumiston@mccarter.com

- and -
David Adler, Esq. (admitted *pro hac vice*)
250 W. 55th Street, 13th Floor

New York, NY 10019
Telephone: (212) 609-6847
Facsimile: (212) 609-6921
dadler@mccarter.com

Counsel to Seth Melamed